

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
ex. rel. MITCHELL D. MONSOUR and
WALTON STEPHEN VAUGHAN

PLAINTIFFS

VS.

CAUSE NO. 1:16CV38HSO-JCG

PERFORMANCE ACCOUNTS RECEIVABLE, LLC,
PERFORMANCE CAPITAL LEASING, LLC,
STEPPING STONES HEALTHCARE, LLC,
WADE WALTERS, CLAYTON V. DEARDORFF,
MIKE BOLEWARE, HOPE THOMLEY,
DENNIS L. PIERCE, and PIERCON, INC.

DEFENDANTS

MOTION TO WITHDRAW

COMES NOW Carol Ann Bustin and Bustin Law Firm, and files this Motion to Withdraw, requesting that Bustin Law Firm and Carol Ann Bustin, be allowed to withdraw as attorney of record for HOPE THOMLEY, and in support thereof would show the following:

1.

Hope Thomley retained Bustin Law Firm to defend against claims brought by relators Mitchel Monsour and Walton Vaughan (“Relators”). At the time of initiation of this matter and during litigation, Carol Ann Bustin was the attorney primarily handling this matter.

2.

On October 26, 2018, the Court stayed litigation in this matter pending conclusion of criminal charges brought against Hope Thomley by the government.

3.

On July 23, 2020, the criminal matter concluded against Hope Thomley with the Court sentencing Hope Thomley to fourteen years in prison. In additional, Hope Thomley was ordered to

pay restitution of \$189,200,787.75 (One-Hundred Eighty-nine Million Two-Hundred Thousand Seven-Hundred Eighty-Seven Dollars and Seventy-Five Cents) and a fine of \$9,109,872.00 (Nine Million One-Hundred Nine Thousand Eight-Hundred Seventy-Two Dollars) which makes Hope Thomley insolvent. Hope Thomley was immediately remanded to the custody of the U.S. Marshal Service and taken to prison to begin serving her sentence.

4.

Because of the outcome of the criminal proceedings, Hope Thomley is without the resources to pay attorney's fees to defend this qui tam suit.

5.

Bustin Law Firm and Carol Ann Bustin request that this Court enter an Order allowing her to withdraw from representation of Hope Thomley. No prejudice will result from withdrawal.

Respectfully submitted this the 23rd day of February, 2021.

HOPE THOMLEY, Defendant

/s/ Carol Ann Bustin

Carol Ann Bustin

CERTIFICATE OF SERVICE

I, Carol Ann Estes Bustin do hereby certify that I have this day served via electronic court filing system a true and correct copy of the above and foregoing Motion to all attorneys and parties therein. THIS, the 23rd day of February, 2021.

/s/ Carol Ann Bustin

CAROL ANN ESTES BUSTIN
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